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November 8, 2024

VIA ECF & FACSIMILE

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

The conf. is adjourned
to Nov. 21, 2024, at 2³⁰ p.m.
NPF-12-24
Alvin K. Hellerstein

Re: *UMG Recordings, Inc. et al. v. Uncharted Labs, Inc. et al.*, No 24 Civ. 04777 (AKH) (S.D.N.Y.)

Dear Judge Hellerstein:

Pursuant to the Court's directive at the case management conference held on November 1, 2024, I write on behalf of all parties in the above-referenced matter with an update regarding the appointment of a Special Master to assist the parties consistent with Your Honor's instruction at the November 1 conference.

The parties have received conflicts disclosures from Judge Andrew Peck and Judge Shira Scheindlin, which we are considering and discussing with our clients. The parties have also met and conferred to discuss the potential appointment of either candidate as Special Master but have yet to reach agreement. Nevertheless, the parties continue to have productive discussions regarding the appointment of a Special Master.

To permit the parties additional time to identify a mutually agreeable candidate, the parties jointly request the Court's leave to submit a further update regarding the Special Master within one week, by November 15, 2024. In light of these ongoing discussions, the parties also respectfully request an adjournment of the upcoming case management conference, presently scheduled for November 13, 2024, at 2:30 p.m. ET. Subject to the Court's availability, the parties are available for a conference on Thursday, November 21 or Friday, November 22.

Thank you for your consideration of these requests.

Sincerely,



Moez M. Kaba